

UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

First-Class Mail and Periodicals  
Service Standard Changes, 2021

Docket No. N2021-1

PRESIDING OFFICER'S INFORMATION REQUEST NO. 3  
AND NOTICE OF FILING UNDER SEAL

(Issued May 19, 2021)

Pursuant to Order No. 5888<sup>1</sup> and 39 C.F.R. § 3020.118, the Postal Service is requested to respond to the following questions to clarify the record on its request for an advisory opinion under 39 U.S.C. § 3661(c) regarding First-Class Mail and Periodicals Service Standard Changes.<sup>2</sup> To facilitate inclusion of the requested material in the evidentiary record, the Postal Service shall have a witness attest to the accuracy of the answers. For each question, produce every document (including any calculations, analysis, assumptions, studies, or workpapers) that were used, relied upon, or referenced in preparing the response. Responses shall be provided as soon as they are available, but no later than May 26, 2021.

The following questions refer to witness Cintron's testimony (USPS-T-1):<sup>3</sup>

1. Please refer to Library Reference USPS-LR-N2021-1/14, May 18, 2021, Excel file "POIR Drive Time Request.xlsx" tab "SPFC Letters and Cards."

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<sup>1</sup> Order Designating Presiding Officer, May 7, 2021 (Order No. 5888).

<sup>2</sup> United States Postal Service Request for an Advisory Opinion on Changes in the Nature of Postal Services, April 21, 2021 (Request).

<sup>3</sup> Direct Testimony of Robert Cintron on Behalf of the United States Postal Service (USPS-T-1), April 21, 2021.

- a. Please confirm that in FY 2020, for First-Class Single-Piece Letters and Cards with a service standard of 2 days and a drive time of within 6 hours, 86 percent were delivered within 2 days and 96 percent were delivered within 3 days (row 10). If not confirmed, please explain. Please also confirm that, with the proposed standards, this mail would be subject to a 3 day service standard and thus 96 percent would have been considered delivered on time.
  - b. Please confirm that in FY 2020, for First-Class Single-Piece Letters and Cards with a service standard of 3 days and a drive time of within 20 hours, 82 percent were delivered within 3 days and 94 percent were delivered within 4 days (row 15). If not confirmed, please explain. Please also confirm that, with the proposed standards, this mail would be subject to a 4 day service standard and thus 94 percent would have been considered delivered on time.
  - c. Please confirm that in FY 2020, for First-Class Single-Piece Letters and Cards with a service standard of 4 days and a drive time of within 41 hours, 71 percent were delivered within 4 days and 83 percent were delivered within 5 days (row 20). If not confirmed, please explain. Please also confirm that, with the proposed standards, this mail would be subject to a 5 day service standard and thus 83 percent would have been considered delivered on time.
2. Please provide an estimate of how much the FY 2020 Service Performance Results for each First-Class and Periodicals product, by service standard, would have increased if the proposed standards had been in effect in FY 2020. Please discuss whether the information provided in Library Reference USPS-LR-N2021-1/14 is useful for the purpose of generating this estimate.
3. Please discuss whether the days-to-delivery and drive time service performance results were used to identify that largest opportunities for service performance improvement and support the proposed changes.

The following question refers to witness Whiteman's testimony (USPS-T-2):<sup>4</sup>

4. Please explain the reasons for the difference in the expected cost savings reported in Docket No. RM2017-3, Comments of the United States Postal Service, March 20, 2017, Appendix C at 4, and the cost savings of \$36.1 million as shown in Library Reference USPS-LR-N2021-1/11, May 17, 2021.
5. Please refer to the Response to POIR No. 1, question 13.c., stating "[b]aseline transportation cost projections in the strategic plan were developed by inflating segments of the FY2021 IFP transportation costs according to Global Insight indices over a ten-year period."<sup>5</sup> Please provide details for each year of the calculation for the row titled "Transportation" in FIGURE 35: 10-Year Delivering for America Projected Profit and Loss Statement – With USPS Initiatives,<sup>6</sup> in an Excel spreadsheet with links and sources explaining the reason for transportation costs holding steady at \$8.3 billion for the full year of implementation of the service standard change and 2 years onwards through FY 2024 and increasing yearly thereafter from \$8.6 billion in FY 2025 to \$10 billion in FY 2030.
6. Please confirm that the capacity variabilities reported in Library Reference USPS-LR-N2021-1/NP2, April 21, 2021, Excel file "Transportation Savings-NonPublic" tab "Highway" cells b22 to b24, sourced from Docket No. RM2014-6, Library Reference USPS-RM2014-6/1, are based on surface transportation for all classes of mail. Please discuss whether the capacity variabilities would be lower

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<sup>4</sup> Direct Testimony of Curtis Whiteman on Behalf of the United States Postal Service (USPS-T-2), April 21, 2021.

<sup>5</sup> Responses of the United States Postal Service to Questions 1-11, 13-34 of Presiding Officer's Information Request No. 1, May 17, 2021 (Response to POIR No. 1).

<sup>6</sup> See United States Postal Service, *Delivering for America: Our Vision and Ten-Year Plan to Achieve Financial Sustainability and Service Excellence*, March 23, 2021, at 51, available at [https://about.usps.com/what/strategic-plans/delivering-for-america/assets/USPS\\_Delivering-ForAmerica.pdf](https://about.usps.com/what/strategic-plans/delivering-for-america/assets/USPS_Delivering-ForAmerica.pdf).

or higher if the same type of study was done for only First-Class Mail and Periodicals.

7. Please refer to Response to POIR No. 1, question 15. Please provide a detailed calculation of each step referenced in the response, with documentation, links and sources for the FY 2021 projections of air costs and surface costs for First-Class Mail and Periodicals for each amount listed in the table titled “Projected Transportation Costs by Mode for FY 2021 for First-Class Mail and Periodicals”. Please provide a similar table with the same documentation for FY 2022, the first full year of implementation.
8. Please refer to response of Witness Whiteman to Postcom interrogatory PostCom/USPS-T-2-1, which states, “While it is possible that the Postal Service might not end the year at the \$9.7 billion net loss projected in the 2021 IFP, the end-of-year net loss could reasonably be expected to fall anywhere in the range of \$2.0 billion to \$9.0 billion.”<sup>7</sup> Please provide the revenue and cost assumptions supporting the updated end-of-year FY 2021 net loss of \$2.0 billion and \$9.0 billion. Please provide an estimated end-of-year FY 2021 cash balance updated for the revised range of net loss.

The following questions refer to witness Hagenstein’s testimony (USPS-T-3):<sup>8</sup>

9. Please refer to Response to POIR No. 1, question 19.a.i., which states “The baseline model using current service standards output 4,073 routings, daily mileage of 2,139,302, and 66% trip utilization.” Please compare the outputs of the baseline model to the actual transportation used by the Postal Service.

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<sup>7</sup> Response of the United States Postal Service Witness Whiteman to Association for Postal Commerce Interrogatory (PostCom/USPS-T2-1), May 18, 2021.

<sup>8</sup> Direct Testimony of Stephen B. Hagenstein on Behalf of the United States Postal Service (USPS-T-3), April 21, 2021.

Please provide the actual routes, daily miles, and trip utilization for the March 2020 period.

10. Please provide another example of a project where the Postal Service has used the Blue Yonder modeling software to identify cost savings opportunities. Please discuss the projected cost savings and the actual cost savings of this project, and detail both how the projection was developed and the actual cost savings were measured.
11. Please refer to Response to POIR No. 1, question 24. Please explain whether the estimated reduction in mileage is expected only in the first year the proposed service standards would be implemented (FY 2022). Please provide additional information related to cost savings and future plans for network improvements
12. Please refer to the Response to POIR No. 1, question 24.a. Please provide the source for the estimated cost savings of \$175 M to \$279 M in FY 2022. Please explain how long it will take to realize the full cost savings from this project, and how the Postal Service plans to measure how savings are realized.
13. Please confirm that one outcome of the proposal will be to increase the crossdocking and dispatch costs at Surface Transfer Centers. If not confirmed, please explain. Please identify where the extra cost associated with increased workload at Surface Transfer Centers are calculated.

The following questions refer to the responses of witness Hagenstein to POIR No. 1,<sup>9</sup> witness Cintron's testimony (USPS-T-1),<sup>10</sup> and witness Whiteman's testimony (USPS-T-2):<sup>11</sup>

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<sup>9</sup> Responses of the United States Postal Service to Questions 1-11, 13-34 of Presiding Officer's Information Request No. 1 (Responses to POIR No. 1), May 17, 2021.

<sup>10</sup> Direct Testimony of Robert Cintron on Behalf of the United States Postal Service (USPS-T-1), April 21, 2021.

<sup>11</sup> Direct Testimony of Curtis Whiteman on Behalf of the United States Postal Service (USPS-T-2), April 21, 2021.

14. The Postal Service explains that the current FCM service standards account for surface transit times with respect to one-day and two-day service standards, but not for service standards of three or more days. USPS-T-1 at 18. The Postal Service explains further that the one-day service standard applies to intra-SCF Presort FCM properly accepted before the day-zero CET, and that the two-day service standard applies to intra-SCF single piece domestic FCM properly accepted before the day-zero CET, as well as to inter-SCF domestic FCM properly accepted before the day-zero CET, if the drive time between the origin P&DC and destination SCF is 6 hours or less. *Id.* Please refer to Library Reference USPS-LR-N2021-1/3, Excel file “3\_Zip3\_OD\_Pairs.xlsx” (3-digit ZIP Pairs file), tab “OD\_Contiguous” and Excel file “3\_SSD\_5D\_Vol\_Impacts\_CONUS.xlsx” (Modeling results file), tab “FCM\_Contiguous\_Impact.”
- a. Please confirm that intra-SCF domestic Presort FCM, intra-SCF single piece domestic FCM, and inter-SCF domestic FCM volumes were included in the model as volumes subject to the current two-day service standard (*i.e.* volume with “FCM\_SSD”=2 in the 3-digit ZIP Pairs file).
  - b. Please explain whether intra-SCF domestic Presort and intra-SCF single piece domestic FCM volumes are transported only within respective SCFs. Please also explain whether these volumes, if included in the model, were modeled as travelling 0 miles, with 0 hours of transit time between origin and destination facilities, in the modeled inter-SCF network.
  - c. Please confirm that the reduced geographic reach of two-day origin-destination pairs (OD Pairs) under the proposed two-day service standards would have no impact on intra-SCF FCM volumes currently subject to one- and two-day service standards, and would only reduce the inter-SCF single piece domestic FCM volume subject to a two-day standard. If not confirmed, please explain. Additionally:

- i. Please confirm that the value in the Modeling results file, tab “FCM\_Contiguous\_Impact,” cell C4, includes intra-SCF domestic Presort FCM, intra-SCF single piece domestic FCM, and inter-SCF single piece domestic FCM volumes within 3 hours drive time between OD Pairs. If not confirmed, please explain. Please also isolate separately the inter-SCF single piece domestic FCM volume which is included in cell C4.
    - ii. Please confirm that the value in cell C5 includes inter-SCF domestic FCM volumes with 3 to 6 hours of drive time between OD Pairs. If not confirmed, please explain.
    - iii. Please explain the volume in cell C6, which pertains to 1 OD Pair.
  - d. Please explain whether the Postal Service expects to employ more or less direct transportation for volumes within 3 hours drive time of origin. Please identify the current surface and transportation costs of inter-SCF First-Class subject to the proposed and current two-day service standard, and the projected change to this mail after implementation of this proposal.
15. Please see Attachment, filed under seal
16. The Postal Service states that the overall current network utilization is approximately 40 percent. Response to POIR No. 1, question 21.d.iii-iv. The Postal Service also explains that the maximum trailer utilization modeled was 41 percent ( $1,575 \text{ ft}^3 / 3,816 \text{ ft}^3$ ). Response to POIR No. 1, question 21.d.i.-ii. Please explain how the following utilizations were accomplished/calculated:
- a. For the baseline network in which current service standards applied, trip utilization was 66 percent. Response to POIR No. 1, question 19.a.i. Please explain the 22 percentage point difference between actual average utilization and utilization in the baseline network. Please also explain how 66 percent utilization is possible with a constraint of a maximum modeled capacity utilization of 41 percent.

- b. Please explain the 74 percent trip utilization which resulted from model's first iteration, considering the 41 percent trailer utilization constraint referenced above. Response to POIR No. 1, question 19.a.i.
  - c. Please explain the 82 percent trip utilization for the new routings, established to carry FCM diverted from the air network and determined to be cost effective. Response to POIR No. 1, question 19.c.ii. In your explanation, please address both the 41 percent trailer utilization constraint and the fact that only FCM volume was added to the model during the second iteration. Responses to POIR No. 1, question 19.b.ii.
17. Please provide information related to Highway Contract Route (HCR) contracts and the estimated reduction in mileage, as requested below.
- a. Please explain how a need for extra trip can be determined, and extra trip scheduled, in advance. See Response to POIR No. 1, question 17.d.
  - b. Please explain whether the Postal Service relies completely on regularly scheduled trips, under HCR contracts with typical duration of about 4 years, to accommodate the separate networks for separate products or whether it relies, and to what extent, on extra trips, scheduled on an as-needed basis and/or scheduled in advance, to accommodate such separate networks. See USPS-T-3 at 6.
  - c. The Postal Service explains that the implementation of more efficient routings with reduced mileage, "could impact" regular, exceptional, or emergency highway contracts. Response to POIR No. 1, question 17.e.
    - i. Considering the projected mileage reduction could impact regular, exceptional, or emergency contracts, please explain why expenses in General Ledger accounts 53619, 53615, and 53611 for Inter-Area, Inter-Cluster, and Inter-P&DC exceptional trips were not included in baseline costs of surface network to calculate savings. See USPS-T-2 at 12-14; Responses to POIR No. 1, question 17.d.- e.



- ii. Please explain potential challenges the Postal Service might face when implementing new routings with reduced mileages for trips under regular HCR contracts, which are typically in effect for 4 years. Please compare those with the ease of reducing mileages for exceptional trips.
  - iii. Please describe whether elimination of extra trips within inter-SCF network, currently scheduled to mitigate plant processing delays, delays associated with dock operations, or personnel issues, would be the first action the Postal Service would take once new service standards (enabling the Postal Service to accommodate such delays) are implemented.
  - iv. Please provide the total mileage for extra trips scheduled in inter-SCF network in Fiscal Year 2020. Please also provide average inter-SCF extra trip distance in FY 2020.
18. Please refer to Response to POIR No. 1, question 19.d., which states “Using two examples of actual Inter-Area, Inter-Cluster, and Inter-P&DC trips, please map these trips to the most relevant OD Pairs. Please also describe similarities and differences between modeled OD Pairs and contracted trips.”
19. Please refer to Response to POIR No. 1, question 19.a.ii.
- a. Please list all products included in “International volumes”
  - b. Please list all products included in “Priority”
  - c. For all products in a. above, provide current service standards.
  - d. For all products in b. above, provide current service standards.
20. Please refer to Response to POIR No. 1, questions 26.b. and 19.a. – 19.c.

The Postal Service provides the number of routings in the baseline model (4,073), optimized surface routing model (3,566), proposed new routings to carry air mail

(1,115), and new routings determined cost-effective (319).<sup>12</sup> The Postal Service also provides estimates of trip utilization in the baseline model (66%), optimized surface routing model (74%), trip utilization for the proposed new routings (57%), and for the new routings determined cost-effective (82%). Lastly, the Postal Service reports routings' mileages in the baseline network and in the network which includes all projected changes associated with the proposed service standards for FCM, for each of Inter-Area, Inter-Cluster, and Inter-P&DC contract categories.

- a. Please explain the difference, if any, between a routing and a trip. In your explanation, please include whether a routing and a trip has daily/annual frequency attributed to it.
  - b. Please provide the number of routings to which reported mileages for each contract category provided in response to question 26.b. pertain.
  - c. If a routing and a trip are not equivalent (do not have same attributes), please provide number of trips per day to which reported mileages for each contract category provided in response to question 26.b. pertain.
  - d. Please explain whether it is possible to determine modeled vehicle capacities for each contract category (question 26.b), considering mileages are determined from the number of routings/trips and modeled trailer capacity is known (53' trailers used in the model). If possible to determine, please provide total vehicle capacities in cubic feet associated with daily routings for each contract category.
21. Please refer to Response to POIR No. 1, question 23. For each potential impact described in a. through d., please specify whether any of the two-, three-, four-, and five-day service standard FCM volumes would be more likely affected, and whether any of these volumes would be least likely affected by these potential impacts.

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<sup>12</sup> The Postal Service refers to these interchangeably as "routings" (question 19) and as "trips" (question 26).

22. Please refer to the Response to POIR No. 1, question 22. Please provide the number of point-to-point routings in the baseline network and the in the projected network. Please quantify how the proposal will decrease the inefficiencies of the transportation network by decreasing point-to point trips.

The following questions refer to witness Monteith's testimony (USPS-T-4):<sup>13</sup>

23. Please refer to USPS-T-4 at 19, where you state "the proposed changes may improve customer satisfaction... ." Please provide any quantitative or qualitative studies that may have contributed to this conclusion beyond the appendixes provided as part of the testimony.
24. In USPS-T-4, witness Monteith states, "[t]he lower sensitivity of Presort mail to changes in Delivery Time is an important finding. It suggests that the estimated impact to [First-Class Mail] is unlikely to be significant given that Presort Letters account for 65 percent of overall [First-Class Mail] volume and Single-Piece Letters is 28 percent." *Id.* at 15. Please also refer to Response to POIR No. 1, question 28.
- a. For the First-Class Mail subject to the proposed service standards, please provide a percentage composition breakdown by mail type. Please include in your response the percentages of the affected mail volumes which are expected to be Presort First-Class Mail and Single-Piece First-Class Mail and sources for these calculations. If you are unable to provide these percentages, please explain.
- b. Please provide the sources for the percentages provided in Response to POIR No. 1, questions 28.a and 28.b.
25. Response to POIR No. 1, question 29.a., states "[w]e provided the 18 percent input to witness Thress to be applied to both First-Class Mail and Periodicals

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<sup>13</sup> Direct Testimony of Steven W. Monteith on Behalf of the United States Postal Service (USPS-T-4), April 21, 2021.

volumes because the end-to-end Periodicals volume impacted by the proposed service standard change traverses our network along with First-Class Mail volume and for the sake of simplicity.” Response to POIR No. 1, question 30 states, “[w]e have some volumes that go through our NDC network, and the timeline for those can range from 6 to 9 days.”

- a. Please confirm that those end-to-end periodical volumes which go into the NDC network do not traverse the network along with FCM volume.” If not confirmed, please explain.
  - b. Please provide the percentage of end-to-end Periodical mail volume which traverses the FCM mail network and the percentage of end-to-end Periodical mail volume which traverses the NDC network. If explicit percentages are not available, please discuss their relative frequency of use by the Postal Service.
  - c. Please confirm that there are no other shipping pathways for end-to-end periodicals besides those two mentioned above (traversing the FCM network and entering the NDC network). If not confirmed, please discuss the other pathways and when and how often they are used.
26. Response to POIR No. 1, question 29.e., states “[i]t is possible to derive increases in Delivery Time for (1) Presort Letters & Cards, (2) Presort Flats, (3) Single-Piece Letters & Cards, and (4) Single-Piece Flats. Response to POIR No. 1, question 29.f., states “[t]he relationship between average delivery time and mail volume which I modeled in USPS-T-5 was estimated based on total mail volume and average delivery days across all mail. The estimates presented in my testimony represent the average impact across all mail and all mailers and may not be indicative of the specific impact of any particular mailer.”
- a. Please confirm whether it is possible to model the relationship between average delivery time and mail volume for specific mail products, such as those referenced in the Response to POIR No. 1, question 29.e. ((1)

Presort Letters & Cards, (2) Presort Flats, (3) Single-Piece Letters & Cards, and (4) Single-Piece Flats).

- b. If confirmed, please explain the advantages and disadvantages of using a more disaggregated model. In your response, please include the reason the Postal Service ultimately chose a more aggregated model.
  - c. If not confirmed, please explain why such disaggregated modeling is not possible.
27. Please refer to Library Reference USPS-LR-N2021-1/10, file "06-USPS BHT Q1'19 Mail-PUBLIC.pdf," Slide 35. This slide states, "Uppercase letters denote significant differences at the 95% confidence interval."
- a. Please confirm that in the Q1'19 survey 53% of survey respondents (N=1072) agreed with the statement that the USPS mail service provides fast mail delivery. If not confirmed, please provide an interpretation of the 53% figure.
  - b. Please confirm that in the Q1'18 survey 65% of survey respondents (N=1292) agreed with the statement that the USPS mail service is reliable. If not confirmed, please provide an interpretation of the 65% figure.
  - c. Please confirm that in the Q1'19 survey 58% of survey respondents (N=1072) agreed with the statement that the USPS mail service is reliable. If not confirmed, please provide an interpretation of the 58% figure.
  - d. Please explain the statistical interpretation of the uppercase "C" (and in other cases "A") which appears next to the 65% figure referenced above. In your response, please confirm whether the following is the correct interpretation: 58% of respondents in Q1'19 agreed with the statement that the USPS mail service is reliable; this is statistically different from 65% who agreed with this statement in Q1'18. If not confirmed, please elaborate on the meaning of "significant differences in the 95% confidence level" and provide the correct interpretation.

- e. Please provide a public interpretation relating the Q1'19 Key Driver Index Score of 160 for "Is reliable" and 159 for "Provides fast mail delivery."
28. Please see Library Reference USPS-LR-N2021-1/9, Excel file "18 Percent Input.xlsx," tab "FCM Delivery Day Change Calc," cell H10. In USPS-T-4, witness Monteith states, "[t]o develop the projections, Thress evaluated the impact to [First-Class Mail] volume if Delivery Time increased by 18 percent as a result of the proposed service standard changes." *Id.* at 15. Please also refer to USPS-T-4 stating, "[t]o develop the projections, Thress evaluated the impact to Periodicals if Delivery Time increased by 18 percent as a result of the proposed service standard changes and holding price and costs constant." *Id.* at 17. Lastly, please refer to USPS-T-5, in which witness Thress states, "[t]he Postal Service estimates that the proposed changes to service standards could increase average delivery time by as much as 18 percent within the affected delivery networks." USPS-T-5 at 36.
- a. Please confirm if Witness Thress used an input for change in Delivery Time of 18.74% as calculated in USPS-LR-N2021-1-9 and not 18.00% as indicated by USPS-T-4 and USPS-T-5.
  - b. If not confirmed, please discuss why the more accurate 18.74% figure was not used for the contribution calculations.
  - c. Please explain the reason the Postal Service estimates the proposed changes could increase delivery times by "as much as 18 percent," given the underlying calculations show increase in delivery times by more than 18 percent.

The following question refers to witness Thress's testimony (USPS-T-5):<sup>14</sup>

29. Please refer to USPS-T-5 at 24. The average days-to-delivery fell by 9.4% in 2014 and then increased by 14.6% in 2015.
  - a. Please explain why the 9.4% decrease in days-to-delivery does not appear in the top figure on page 6 of your testimony.
  - b. Please confirm whether you performed a detailed econometric analysis of the relationship between volume and days-to-delivery during the period of large changes that occurred from 2012 – 2015. If confirmed, please provide the results of this analysis, including a discussion of whether you estimated a microeconomic model known as Regression Discontinuity Design. If not confirmed, please explain why you did not perform a more detailed investigation into this time period.
30. Please discuss the advantages and disadvantages of estimating an Ordinary Least Squares regression model to identify causal parameters outside the scope of a randomized control trial.
  - a. Do you find that data drawn from period of analysis, 2000—2020, satisfy the necessary identification assumptions required for estimates based on an Ordinary Least Squares regression model to be unbiased and consistent, therefore allowing the researcher to make statistical statements about the underlying population parameter of interest? If yes, please explain. If no, please explain what other assumptions you have made to allow for the causal interpretation of estimates that is seen throughout this testimony.

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<sup>14</sup> Direct Testimony of Thomas E. Thress on Behalf of the United States Postal Service (USPS-T-5), April 21, 2021.

31. Please explain why adding days-to-delivery as an additional covariate in your econometric forecasting model increases the accuracy of the econometric volume forecast.
- a. Please explain why this explanatory variable was not included in any previously filed forecasting models.
  - b. Please discuss whether the Postal Service intends to continue to include this explanatory variable in future forecasting models.
  - c. Please discuss the bias-variance trade-off that exists when a researcher adds additional explanatory variables to an econometric model, including the implications of the bias-variance trade-off in this specific case of adding additional explanatory variables to this forecasting model, such as days-to-delivery.
  - d. In evaluating the merits of including days-to-delivery among the large set of explanatory variables included in the volume forecast model, did you undertake any out-of-sample testing of the final forecasting model. For example, estimating your model based on half of the historical data, and then evaluating the performance of your model, for example, the Mean Squared Error, based on the other half of the historical data.

Christopher Laver  
Presiding Officer